

UNITED STATES DISTRICT COURT

for the
Southern District of Texas

United States District Court
Southern District of Texas
FILED

MAY 30 2019

David J. Bradley, Clerk of Court

In the Matter of the Search of

(Briefly describe the property to be searched
or identify the person by name and address)

Priority Mail Parcel 9505513812989143274248,
addressed to "Dean Williams, 4524 Chisum St.,
Houston, TX 77020"

Case No.

H19-0992

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):
Priority Mail Parcel 9505513812989143274248, addressed to "Dean Williams, 4524 Chisum St., Houston, TX 77020", located at US Postal Inspection Service Houston Headquarters.

located in the Southern District of Texas, there is now concealed (identify the person or describe the property to be seized):
narcotics and/or controlled substances

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section
21 USC 841(a)(1)
21 USC 846

Offense Description
Distribution of a Controlled Substance
Conspiracy

The application is based on these facts:
see attached affidavit

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

Joseph S. MacDougall, Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date: 05/30/2019

City and state: Houston, TX

Judge's signature

Hon. Frances H. Stacy, U.S. Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In the Matter of the Search of

**United States Postal Service
Priority Mail Parcel
9505513812989143274248**

§
§
§
§
§

Magistrate No. _____

AFFIDAVIT IN SUPPORT OF SEARCH WARRANT

I, Joseph MacDougall, being duly sworn, state the following:

1. I have been employed by the United States Postal Inspection Service for the past seven (7) years. During my career as a federal law enforcement officer, I have worked drug trafficking investigations and participated in hundreds of controlled substance investigations involving the transportation of controlled substances or proceeds/payments through parcel delivery services, to include the United States Mails, as well as private delivery couriers such as United Parcel Service (UPS) and Federal Express (FedEx). During this time, I have intercepted or helped in intercepting in excess of one-thousand (1,000) parcels which were found to have contained controlled substances or the proceeds of controlled substance sales. I have received training by the United States Postal Inspection Service (USPIS) in the investigation of controlled substances or the proceeds of narcotics sales being transported through parcel delivery services.

2. I also rely upon the training and experience of other members of the USPIS Houston Division Narcotics Team. The team is comprised of six (6) members, three (3) of whom have been assigned to narcotics investigations for at least two (2) years. During that time, the USPIS Houston Division Narcotics Team has intercepted in excess of five-thousand (5,000) parcels which were found to have contained controlled substances or the proceeds of controlled substance sales or moneys furnished or intended to be furnished in exchange for controlled substances.

3. Experience and drug trafficking intelligence information gathered by the USPIS have demonstrated that the U.S. Postal Service Express Mail and Priority Mail are frequently utilized by drug traffickers for shipping controlled substances or the proceeds of controlled substance sales or moneys furnished or intended to be furnished in exchange for controlled substances. Use of Express Mail and Priority Mail are favored because of the speed (Express Mail - overnight; Priority mail – two-day delivery), reliability, free telephone and Internet package tracking services, as well as the perceived minimal chance of detection. Express Mail and Priority Mail were originally intended for urgent business-to-business correspondence. Intelligence from prior packages, which were found to contain controlled substances or the proceeds of controlled substance sales or moneys furnished or intended to be furnished in exchange for controlled substances, has indicated that these parcels are usually addressed from

an individual to an individual. Express Mail and Priority Mail are seldom used for individual-to-individual correspondence.

4. In an effort to combat the flow of controlled substances through the overnight delivery services, interdiction programs have been established in cities throughout the United States by the USPIS. These cities have been identified as known 'sources' of controlled substances. The USPIS conducts an ongoing analysis of prior packages mailed through overnight delivery services, which were found to contain controlled substances or proceeds/payments of controlled substance sales. The analysis of prior packages, which were found to contain controlled substances or the proceeds of controlled substance sales or moneys furnished or intended to be furnished in exchange for controlled substances, indicated that these parcels are usually sent from an individual to an individual. In the few cases when overnight delivery packages containing controlled substances or the proceeds of controlled substance sales or moneys furnished or intended to be furnished in exchange for controlled substances, have displayed a business or company name, it has usually proven to be fictitious or used without the owner's knowledge and consent. Additionally, this analysis has established a series of characteristics which, when found in combination of two (2) or more, have shown a high probability that the package will contain a controlled substance or the proceeds of controlled substance sales or moneys furnished or intended to be furnished in exchange for controlled substances. Information collected by the USPIS has demonstrated that the presence of these characteristics is significant for delivery services, to include U. S. Postal Service Express Mail, Federal Express, and United Parcel Service. This profile includes, but is not limited to, the following characteristics: package mailed from or addressed to a narcotic source city; package has a fictitious return address; package addressee name is unknown at the destination address; package sender name is unknown at the return address; package has address information which is handwritten; package is mailed to or from a Commercial Mail Receiving Agency (CMRA); package is addressed from an individual to an individual; phone numbers listed on the package are not related to the listed parties or are not in service; packages are wrapped and/or heavily taped; frequency of the mailings is inconsistent with normal use absent a business relationship; and the ZIP Code from where the package is mailed is different than the ZIP Code used in the return address.

5. The USPIS analysis of prior narcotics packages mailed through overnight delivery services has consistently shown that the identification of 'source' cities has proven to be one of several reliable characteristics used in identifying suspect parcels. This analysis has also demonstrated that narcotics parcels originating from states other than source locations have been consistently found to contain 'designer' drugs, such as Ecstasy, GBL, GHB, Anabolic Steroids, and other similar controlled substances. Generally such 'designer drugs' are not organic and are the product of a laboratory process. USPIS has identified El Monte, CA as a source city for narcotics.

6. This Affidavit is made in support of an Application for a federal search warrant to search United States Postal Service (USPS) Priority Mail Parcel 9505513812989143274248 ("Subject Parcel") described more particularly as follows:

Subject Parcel:	Express Mail Parcel 95055 13812989143274248
Addressee:	Dean Williams 4524 Chisum St. Houston, TX 77020
Sender:	10022 Roads End Garden Grove, CA 92840
Size/Dimensions:	White Medium Priority Flat-Rate Mailing Box Approximately 12" x 3.5" x 14."
Postmarked:	May 23, 2019
Postmark City:	El Monte, CA
Postage Amount:	\$14.35
Weight:	1 lb. 14.30 oz.

7. On December 11, 2018, Inspector MacDougall was contacted by Inspector Jared Dimick, Salt Lake City, who reported a company operating out of California, "Golden Gorilla," was operating as an unlicensed distributor of marijuana and tetrahydrocannabinol (THC)-vaporizer cartridges (THC is a chemical derived from marijuana), and distributing them via the U.S. Mail service. Inspector Dimick reported that a large number of shipments were being sent to the Houston, TX area.

8. Inspector MacDougall queried postal business records associated with or to "Golden Gorilla" and identified several addresses in the Houston area. Inspector MacDougall identified the address "4524 Chisum St., Houston, TX 77020" as an active receiver of "Golden Gorilla" parcels. Postal records showed that over the past year, over 140 parcels matching the "Golden Gorilla" profile were delivered to the target address addressed to "Dean Williams." Inspector MacDougall placed a watch on the address.

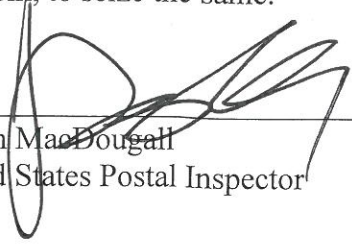
9. On May 24, 2019, Inspector MacDougall was alerted to two inbound parcels from Santa Clarita, CA. A controlled delivery was conducted of the parcels with Houston Police HIDTA. Surveillance of the residence observed an SUV occupied by two black males arrive at 4524 Chisum Ct., Houston, TX 77020," and they retrieved the parcels and entered the residence. Shortly after, a black male, later identified as Darrian Williams, left the address with the parcel bags and departed in the SUV. After HPD Officers observed a traffic violation, they conducted a traffic stop. HPD Officers approached the vehicle and noted a strong smell consistent to the smell of marijuana. A narcotics canine (K9) was brought to the vehicle and the handler stated that the K9 alerted to the presence of an odor of a controlled substance. Inside the vehicle, HPD Officers recovered the parcel bags delivered to and carried away from 4524 Chisum St, Houston, TX 77020, and they were found to contain approximately 5.2 lbs. of hydroponically-grown marijuana. Darrian Williams was placed under arrest for possession of

marijuana.

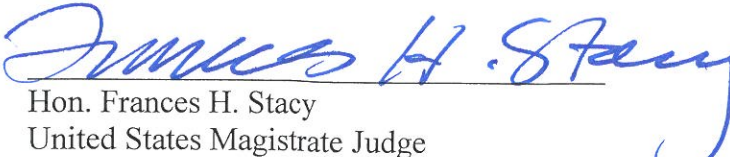
10. On May 24, 2019, Inspector MacDougall was alerted to two more parcels scheduled for delivery to 4524 Chisum St., Houston TX 77020 that matched the size, weight, and shape consistent with "Golden Gorilla" parcels. Inspector MacDougall contacted the Denver Harbor Post Office and requested the parcels be stopped. On May 28, 2019, Inspector MacDougall obtained the Subject Parcel and noted it bore several indicators for narcotics. The parcels were from El Monte, CA, a known source location for high-grade marijuana, but listed a different city, Garden Grove, CA as the return address. The parcels were mailed over the counter, person-to-person, with a handwritten label, and were heavily taped. Additionally, the return address was lacking a sender name.

11. To not further delay the mail, on May 28, 2019, the aforementioned Subject Parcel was exposed to a narcotic detection canine "Rex" at the Missouri City Police Department located at 3849 Cartwright Rd., Missouri City, TX 77459. Rex is handled by Brian Motto, K9 Officer with the Missouri City Police Department. Officer Motto and Rex are certified as a team in the detection of controlled substances. Rex has numerous hours of training in the detection of controlled substances such as marijuana, cocaine, methamphetamine, ecstasy, and heroin. Rex has successfully alerted on concealed controlled substances in numerous prior cases, which has led to the arrests of numerous suspects for drug law violations. Rex conducted an off-leash search of the area and did not alert to the presence of narcotics in the area. The Subject Parcel was then placed inside the police department loading dock. Rex conducted an off-leash search of the area and the Subject Parcel. According to Officer Motto, Rex indicated a positive alert to the presence of a controlled substance scent inside the Subject Parcel.

12. Based upon the foregoing facts and circumstances, there is probable cause to believe that a controlled substance(s) and/or evidence of violations of 21 U.S.C. §§ 841(a) and 846 are contained in the Subject Parcel. Therefore, I respectfully request to search the Subject Parcel for any such controlled substance(s) or evidence of violations of 21 U.S.C. §§ 841(a) and 846, and if any such contraband or evidence be found therein, to seize the same.


Joseph MacDougall
United States Postal Inspector

Subscribed and sworn to before me at Houston, Texas, on this 30th day of May, 2019, and I so find probable cause.


Hon. Frances H. Stacy
United States Magistrate Judge